

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS H. HAGLOF,

Defendant.

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Cause No. 4:20-CR-00384 HEA

DEFENDANT’S SECOND MOTION TO CONTINUE THE TRIAL SETTING

Comes Now the Defendant, by counsel, and requests the above cause be continued from the trial setting of April 11, 2022, and reset for a plea hearing. In support of this motion the Defendant states to the court as follows:

1. The Trial is set on April 11, 2022. The parties are in final negotiations on the disposition of this matter and have prepared a draft plea agreement.
2. Defense Counsel is attempting to obtain all the requested restitution information from the Government before the case is pled so that Counsel has adequate time to evaluate the requests and can assess or negotiate restitution in this case. The Government has indicated that they are still seeking the information and more time is needed to provide it to Defense Counsel.
3. Based on the foregoing, Counsel needs additional time to receive and go over these materials with Defendant.
4. From conversations with the Defendant, Counsel believes Defendant will ultimately accept a plea agreement and the case will not be a trial.
5. The Defendant is also undergoing a psychological evaluation and counsel believes that will be completed by the middle of May.

6. The Defendant consents to this continuance and has filed a Waiver of Speedy Trial.

7. Further, the Defendant agrees that the Court may make a finding that the ends of justice served by the delay in setting the trial and that the delay outweighs the best interests of the public and the Defendant in a speedy trial under 18 U.S.C. § 3161(h)(7)(A), (h)(7)(B)(i) and (h)(7)(B)(iv), and that the Court may exclude the time between the filing of this motion and the date of the trial or any consolidated hearing from the Speedy Trial calculation.

WHEREFORE, for the foregoing reasons the Defendant requests the above cause be continued from the trial setting and reset in the month of May for a Change of Plea Hearing.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By s/ Daniel A. Juengel
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CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Jillian Anderson
United States Attorney
111 South Tenth Street
St. Louis, Missouri, 63102

s/ Daniel A. Juengel
DANIEL A. JUENGEL